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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8

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March 28, 2000

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Compliance & Env. Justice

John R. Jacus, Esq.
Davis, Graham & Stubbs
4410 Arapahoe Ave.
Suite 200
Boulder, CO 80303Re: Hecla Mining Co.,
Docket No. RCRA-8-99-06

Dear Mr. Jacus:

Thank you for your letter of March 16, 2000, in which you provided additional information regarding the SOPs submitted with Hecla's workplans, as well as a report containing Table 2-1. As I indicated in my February 24th letter to you, EPA has additional questions regarding Hecla's February 12, 1999 Information Request Response ("Response"). EPA requests that Hecla submit answers to the following questions not more than twenty (20) days after your receipt of this letter:

1. In Attachment D to the Response, please explain what is meant by the "WGC cleanup" for which the TCLP lab results indicate that sample WGC 3G failed for arsenic at 23.80 ppm, cadmium at 4.20 ppm, and lead at 12.80 ppm; sample WGC 3E failed for cadmium at 8.00 ppm and lead at 82 ppm; and sample WGC-43 failed for cadmium at 6.50 ppm and lead at 52.00 ppm. What necessitated the cleanup, in what timeframe did it occur, what volume of material was cleaned up, and how were the wastes managed?
2. From Attachment G to the Response, please specifically identify the referenced organics:
 - a. Copper solvent extraction: the "organic liquid, which has an affinity for copper".
 - b. Gallium solvent extraction: the "organic liquid with an affinity for gallium".
 - c. Gallium purification and second solvent extraction: the "solvent used in the second solvent extraction stage".
 - d. Germanium solvent extraction: the "combination of organic reagents with a strong affinity for germanium".
3. From Attachment L to the Response, please provide any other process specifics, including identification of specific major chemical additives, such as compounds for pH adjustment, acids, solvents, bases, cleaners, flocculents, etc. used in the process. Attachment L



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discusses the use of Russian cobalt ingots as the feedstock; please provide any further available information on the sources and types of feedstocks used during Hecla's years of cobalt sulfate production, including screening procedures and acceptability criteria, and expected impurities.

4. From Attachment Q to the Response, please provide a further description of the solvent extraction circuit drawn on the plant layout map.
5. Included in the Response is an "As-Built Waste Facilities Layout" map of the St. George Mining Corporation ("SGMC"), dated December 12, 1986. This layout map included a structure drawn to the southwest of Pond 3B South, identified as the "burn pit". Please describe the activities that, to the best of your knowledge, had been conducted by SGMC in this burn pit. Further please describe the years of usage and all activities conducted by Hecla in the burn pit, including all material types and quantities burned in the pit and management of all residues from such burning activity. Please indicate when the use of this burn pit was discontinued, describe removal of materials from this burn pit including the timeframe, quantity removed, and disposal method. Please indicate what structures were built in the burn pit location and when.
6. Please provide a complete description of septic tanks and leach fields used during the years of Hecla's operations and a site map showing the location of each. Please include the capacity of each septic tank and provide detail on which buildings and processes were connected to each septic tank and leach field.
7. Please provide all characterization data collected as part of work conducted in accordance with Attachment E of the Sales Agreement, not just confirmatory data provided in Attachment C of the Response for the cleanup verification soil samples. Please provide all analytical data collected in the May 1995 sampling event referenced in Exhibit E and data from all other sampling events conducted after May 1995 as part of the remediation effort.
8. Please provide a complete response to Question 15 in EPA's June 1, 1999, information request, providing all information and documentation responsive to the scope of the request.

Thank you for your assistance in this matter. Please do not hesitate to call me if you have any questions or need further clarification regarding any of the above issues.

Sincerely,



Lauren C. Buehler
Enforcement Attorney

cc: Linda Jacobson, 8ENT-T
John Galbavy, Hecla Mining Co.